

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -
U2 HOME ENTERTAINMENT, INC.,

Plaintiff,

vs.

XIU HUI CHEN AND "JOHN DOES" II THROUGH
V DOING BUSINESS AS "BROADWAY AUDIO"

Defendants.
- - - - -

07-CIV-8297 (SHS)

AFFIRMATION OF WALTER-MICHAEL LEE IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST
XIU HUI CHEN DOING BUSINESS AS "BROADWAY AUDIO"

WALTER-MICHAEL LEE, hereby affirms and states under penalty
of perjury as prescribed by 28 U.S.C. § 1746:

1. I am an attorney with the firm Sargoy, Stein, Rosen & Shapiro, attorneys for plaintiff in the above entitled action. I am admitted to practice before this Court and am familiar with all the facts and circumstances in this action. I submit this affirmation in support of plaintiff's motion for the entry of a default judgment against the defendant Xiu Hui Chen d/b/a "Broadway Audio" (hereinafter referred to as "Defendant".)

2. On October 12, 2007, at the return date for the Order to Show Cause issued in this case, Ms. Chen appeared with her friend who acted as an interpreter. Ms. Chen admitted that she worked at the "Broadway Audio" store.

3. Shortly thereafter, I served interrogatories and

document requests on the defendants.

4. Although we received no response to these requests, on November 8, 2007, I received a phone call from an attorney, Weishan Wang, acting on behalf of Ms. Chen. Mr. Wang asked plaintiff's position to settle this case with Ms. Chen.

5. On December 5, 2007, I again spoke to Mr. Wang who told me that he never heard back from Ms. Chen and would not be representing her.

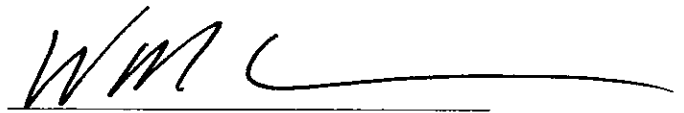
6. Shortly thereafter, the complaint was amended to name Ms. Chen as a defendant.

7. I have had no further contact from Ms. Chen or from any other person acting on her behalf.

WHEREFORE, it is respectfully requested that plaintiff's motion for a default judgment be granted.

Dated: New York, New York

February 6, 2008

A handwritten signature in black ink, consisting of stylized initials 'WML' followed by a long horizontal flourish.

Walter-Michael Lee